

Schiller & Knapp, LLP
950 New Loudon Road
Latham, New York 12110
ws 3360

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Residential Capital,

Debtor

**NOTICE OF MOTION FOR
RELIEF FROM AUTOMATIC STAY**

Case No. 12-12020-mg
Chapter 11
HON. MARTIN GLENN

PLEASE TAKE NOTICE, that upon the annexed Request for Relief of Schiller & Knapp, LLP, attorneys for Associate Partners, LLC (hereinafter “AP”) the undersigned respectfully moves this Court for an order, pursuant to **11 U.S.C. Section 362(d)(1)** modifying the automatic stay herein to permit AP, its servicing agent, nominees, successors and/or its assigns to proceed with an action to foreclose the right of redemption pursuant to the Official Code of Georgia Annotated Section 48-4-40 on the real property commonly known as 180 Ivey Lake Parkway, Temple, Georgia 30179, together with such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE, that this motion shall be returnable on the 26th **day of August at 10:00 a.m.** o'clock in the forenoon of that day, before the Hon. Martin Glenn, or as soon thereafter as counsel can be heard, at 1 Bowling Green, 5th Floor, Room

501, New York, NY.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, must comply with the Federal Rules of Bankruptcy Procedure, shall be filed with the Court and served upon and received by Schiller & Knapp, LLP, attorneys for AP, at their offices located at 950 New Loudon Road, Latham, New York 12110, Attention: William B. Schiller, Esq., so that they are received no later than three (3) days before the hearing on the Motion.

PLEASE TAKE FURTHER NOTICE, that the hearing may be adjourned from time to time without further notice other than the announcement of such adjournments in open Court.

Dated: July 7, 2014

/s/ William B. Schiller
WILLIAM B. SCHILLER, ESQ.
Schiller & Knapp, LLP
Attorneys for Associated Partners, LLC
950 New Loudon Road
Latham, New York 12110
(518) 786-9069

To: Residential Capital, LLC
1177 Avenue of the Americas
New York 10036

Stefan W. Engelhardt, Esq.
Todd M. Goren, Esq.
Gary S. Lee, Esq.
Lorenzo Marinuzzi, Esq.
Anthony Princi, Esq.
Norman Scott Rosenbaum, Esq.
Morrison & Foerster, LLP
1290 Avenue of the Americas
New York 10104

Jessica G. Berman, Esq.
Meyer, Suozzi, English & Klein, P.C.
990 Stewart Avenue, Suite 300
Post Office Box 9194
Garden City, New York 11530-9191

Donald H. Cram, Esq.
Severson & Werson, P.C.
One Embarcadero Center, Suite 2600
San Francisco, CA 94111

George M. Geeslin, Esq.
Eight Piedmont Center, Suite 550
3525 Piedmont Road, N.E.
Atlanta, GA 30305-1565

Bonnie R. Golub, Esq.
Weir & Partners, LLP
The Widener Building, Suite 500
1399 Chestnut Street
Philadelphia, PA 19107

Steven J. Reisman, Esq.
Curtis, Mallet-Prevost, Colt & Mosle, LLP
101 Park Avenue
New York 10178

John W. Smith T, Esq.
Bradley Arant Boult Cummings, LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, AL 35203

Joel C. Haims, Esq.
Kayvan B. Sadeghi, Esq.
Morrison & Foerster, LLP
250 West 55th Street
New York, NY 10019-9601

Office of the United States Trustee
33 Whitehall Street, 21st Street
New York, New York 10004

Kurtzman Carson Consultants, LLC
Attention: James Le
2335 Alaska Avenue
El Segundo, CA 90245

Kenneth H. Eckstein, Esq.
Douglas Mannal, Esq.
Steven S. Sparling, Esq.
Stephen Zide, Esq.
Kramer Levin Naftalis & Frankel, LLP
1177 Avenue of the Americas
New York, New York 10036

Robert J. Feinstein, Esq.
Pachulask Stang Ziehl & Jones, LLP
780 Third Avenue, 36th Floor
New York, New York 10017-2024

Ronald J. Friedman, Esq.
Robert D. Nosek, Esq.
Silverman Acampora LLP
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753